

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	CASE NO. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC	§	CHAPTER 11
	§	
DEBTOR	§	

**UNITED STATES TRUSTEE’S WITNESS AND EXHIBIT LIST FOR HEARING
SCHEDULED FOR SEPTEMBER 20, 2022, AT 1:00 PM**

Kevin M. Epstein, the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) submits this Witness and Exhibit List for the hearing scheduled for September 20, 2022, at 1:00 p.m., Central Time (or as such hearing may be continued or rescheduled).

Case No: 22-60043	Name of Debtor: Free Speech Systems, LLC
	Judge: Christopher Lopez
	Hearing Date: September 20, 2022
	Hearing Time: 1:00 PM
	Party’s Name: United States Trustee
	Attorney’s Name: Ha M. Nguyen
	Attorney’s Phone: 202-590-7962

WITNESSES

The U.S. Trustee may examine:

1. W. Marc Schwartz;
2. Kyung S. Lee;
3. Any witness called by any other party; and
4. Any witness(es) necessary to rebut the testimony of any witness(es) called or designated by any other party

MOTIONS TO BE HEARD

Application to Employ W. Marc Schwartz and Schwartz Associates LLC as Chief Restructuring Officer. (Attachments: # 1 Proposed Order # 2 Exhibit A - Engagement Agreement # 3 Exhibit B - Schwartz Declaration # 4 Exhibit C - FSS Company Agreement)

Application to Employ Shannon & Lee LLP as Bankruptcy Co-Counsel to the Debtor. (Attachments: # 1 Proposed Order # 2 Exhibit A - Engagement Agreement # 3 Exhibit B - Lee Declaration)

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1.	Free Speech System LLC's Schedules [Dkt. No. 121]				
2.	Free Speech Systems LLC's Statement of Financial Affairs [Dkt. No. 122]				
3.	InfoW Debtors' Application to Employ Kyung S. Lee PLLC as Bankruptcy Counsel Effective as of May 16, 2022 [Dkt. No. 97 in Case No. 22-60020]				
4.	InfoW Debtors' Emergency Application for Interim and Final Orders (a) Authorizing the Employment of W. Marc Schwartz as Chief Restructuring Officer, (b) Authorizing Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (c) Granting Related Relief				
5.	E-Mails between Jayson Ruff, Kyung Lee, and others re: Dates relating to Motion to Dismiss				

6.	InfoW Debtors' Emergency Motion to (a) Extend Answer Date, (b) Extend Exhibit Designation Date, (c) Toll Discovery Deadlines, (d) Continue Hearing on Motions to Dismiss and (e) Grant Related Relief [Dkt. No. 95 in Case No. 22-60020]				
7.	InfoW Debtors' Omnibus Response to Motions to Dismiss [Dkt. No. 112 in Case No. 22-60020]				
8.	Free Speech Systems, LLC's Application to Employ W. Marc Schwartz as Chief Restructuring Officer [Dkt. No. 83]				
9.	Free Speech Systems, LLC's Application to Employ Shannon & Lee as Bankruptcy Co-Counsel [Dkt. No. 85]				
10.	Pre-petition billing invoices for KSLPLL from 5.24.22 to 5.31.22 (Free Speech Systems)				
11.	Pre-petition billing invoices for Shannon & Lee LLP from 6-1-22 to 6-30-22 (Free Speech Systems, LLC)				
12.	Detailed time report for Schwartz Associates from 5-24-22 to 6-08-22 (Free Speech Systems, LLC)				
13.	Detailed time report for Schwartz Associates from 5-01-22 to 6-09-22 (InfoW Debtors)				

14.	Transcript of Hearing May 19, 2022				
15.	Transcript of Hearing August 3, 2022				
16.	Demonstrative Exhibit of Timeline				
17.	Any exhibit introduced by any other party				
18.	Any exhibit identified or offered by any other party				

The U.S. Trustee reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

RESPECTFULLY SUBMITTED:
KEVIN M. EPSTEIN
UNITED STATES TRUSTEE

DATED: September 16, 2022

/s/ HA M NGUYEN
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